

3. Defendant Liberty Mutual Fire Insurance Company is a corporation organized under the laws of the State of Wisconsin and for federal court jurisdiction/diversity of citizenship disclosure purposes, the principal place of business is 175 Berkeley Street, Boston, Massachusetts; therefore Liberty Mutual Fire Insurance Company is deemed to be a Wisconsin citizen for purposes of diversity.

4. Jurisdiction is conferred upon this Court pursuant to 28 U.S.C. § 1332. Removal is proper pursuant to 28 U.S.C. §1441, et seq.

5. In this case, Plaintiffs bring causes of action for breach of an insurance contract and bad faith against Liberty Mutual Fire Insurance Company, arising from an insurance claim for hail/wind damage to a commercial property.

6. The Petition alleges that Plaintiffs are entitled to damages from Liberty Mutual in “an amount in excess of Seventy-Five Thousand Dollars (\$75,000.00).” Thus, the amount in controversy exceeds the amount which is required for diversity jurisdiction.

7. Pursuant to 28 U.S.C. § 1332(a)(1), this Court has jurisdiction because of the complete diversity of citizenship of the parties and there is a sufficient amount in controversy.

8. Pursuant to 28 U.S.C. § 1446(a), Defendant acknowledges that this Notice of Removal is signed and filed pursuant to Rule 11 of the Federal Rules of Civil Procedure.

WHEREFORE, Defendant Liberty Mutual Fire Insurance Company requests this Notice of Removal be accepted by this Court and that the lawsuit proceed as an action

properly removed to this Court's jurisdiction.

Respectfully submitted,

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Attorneys for Defendant

***Liberty Mutual Fire Insurance Company,
improperly named as Liberty Mutual Fire
Insurance Company d.b.a Liberty Mutual
and/or Liberty Mutual Group***

CERTIFICATE OF SERVICE

 X I hereby certify that on September 22, 2016, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of Court will transmit a Notice of Electronic Filing to the following ECF registrants:

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Norman, OK 73072

Attorney for Plaintiff

/s/ Tim D. Cain

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